

October 16, 2001

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
TW-A325, The Portals  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: National Wholesale Performance Measures

Dear Ms. Salas:

This is in response to the Commission's request for input regarding the concept of national wholesale performance measures. Thank you for the opportunity to contribute to the discussion. SBC understands that such measures would focus on the elements necessary for competitors to provide POTS service and that this might include loops, interconnection trunking, and transport products.

SBC understands that a national set of standards could be an effective management tool for interconnection performance. Today, each state has developed its own set of performance standards, creating a complex arrangement of systems and reports without any sense of priority. FCC attention in this matter could either greatly simplify the situation or further add to the complexity. The key to success will be the design of the concept. To this end, SBC offers up the following principles.

A national model must:

- Be based on the obligations in Section 251(c), focusing on the facilities necessary for LEC competitors to provide POTS service.
- Ensure carriers are not subject to multiple, potentially inconsistent measurement. This can be achieved by either 1) imposing national standards as a default, applying them only in the absence of state or privately negotiated measures or 2) preempting state or privately negotiated measures.
- Be linked to the deregulation of Broadband, if the scope of the model exceeds POTS.
- Use existing state standards as models where possible, allowing SBC to use previous investment in reporting systems and processes where reasonable.

- Identify a common set of reasonable statistical methodologies to be used nationally.
- Base measures on parity standards, not fixed.
- Allow for exceptions in circumstances that are beyond the company's control, such as order quality or customer not ready situations.
- Have a clear sunset, linked to the sunset provision in Section 272 (f) (1).

A model that fulfills all of these principles will be challenging to devise. SBC will continue to join in the discussion as the record develops.

Sincerely,

Caryn Moir

CC: Cathy Carpino